

SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed October 2, 2006. Claim 1 is amended and claims 1-6 and 9 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1-3 and 5 as anticipated under 35 U.S.C. § 102(b) by U.S. Patent No. 4,768,081 to Moeller (“*Moeller*”). Applicants respectfully traverse the Examiner’s rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). For at least the reasons explained below, *Moeller* cannot anticipate these claims because it does not disclose every element and limitation recited therein.

Claim 1, as amended, recites an apparatus combination including:

a die mounted on a substrate, the die being connected to the substrate by a plurality of wires; and

a mold cap encapsulating the die and the plurality of wires, the mold cap comprising an electrically insulating portion encapsulating substantially all the wires and the entire die, and a thermally conductive portion encapsulating substantially all the electrically insulating portion, wherein the thermally conductive portion is *in direct contact only with the substrate and the entire part of the surface of the electrically insulating portion that is not in contact with the substrate, the die or the wires.*

(emphasis added). In figure 1a, *Moeller* discloses an apparatus in which a die B is attached to a substrate S and is wire bonded by wires D to conductive paths LB. Die B, wires D, and part of conductive paths LB are encapsulated in a synthetic layer G (col. 3, lines 1-10). Synthetic layer G is covered by a film F comprising a metal layer (col. 3, lines 8-9), and the entire structure—die B, wires D, synthetic layer G and metal film F—is encapsulated with epoxy resin H.

Because epoxy resin H is in contact with metallic layer F, *Moeller* cannot disclose, teach or suggest a combination including a thermally conductive portion encapsulating substantially all the electrically insulating portion wherein the thermally conductive portion is “in direct contact” only with “the substrate and the entire part of the surface of the electrically insulating portion that is not in contact with the substrate, the die or the wires.” For at least this reason, Applicants submit that *Moeller* cannot anticipate the claim. Applicants therefore respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 2-3 and 5, if an independent claim is allowable, then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 1 is in condition for allowance. Applicants submit that claims 2-3 and 5 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 4, 6 and 9 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, *Moeller* in view of U.S. Patent No. 6,309,915 to DiStefano (“*DiStefano*”). Applicants respectfully traverse the Examiner’s rejections. If an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, independent claim 1 is in condition for allowance. Applicants submit that claims 4, 6 and 9 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

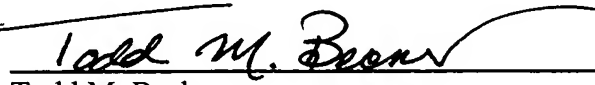
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Respectfully submitted,

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Date: 1-31-07



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Enclosures: Postcard
Amendment transmittal, in duplicate
Petition for a one-month extension of the reply period
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